

REMARKS

Claims 18 through 22 and 24 through 32 are pending in this application. Claims 18 and 27 are amended herein. New claims 31 and 32 are added herein. Support for the amendments to the claims may be found in the claims as originally filed. Reconsideration is requested based on the foregoing amendment and the following remarks.

Response to Restriction Requirement:

The Applicant elects Group I, claims 18 through 22 and 24 through 26, with traverse, for further prosecution on the merits. New claims 31 and 32 are submitted to belong to Group I as well, since they are based on cancelled claim 23, and the Applicant also elects those claims for further prosecution on the merits.

PCT Rules 13.1 and 13.2 provide:

13.1 Requirement

The international application shall relate to one invention only or to a group of inventions so linked as to form a single general inventive concept ("requirement of unity of invention").

13.2 Circumstances in Which the Requirement of Unity of Invention Is to Be Considered Fulfilled

Where a group of inventions is claimed in one and the same international application, the requirement of unity of invention referred to in Rule 13.1 shall be fulfilled only when there is a technical relationship among those inventions involving one or more of the same or corresponding special technical features. The expression "special technical features" shall mean those technical features that define a contribution which each of the claimed inventions, considered as a whole, makes over the prior art.

The Applicant requests respectfully some evidence to support the assertion at page 2 of the Office Action to the effect that claim 18 is obvious in view of the patent to Kohr et al., US 6,110,253. Otherwise, the Applicant traverses the assertion.

It is submitted that even if it were true that claim 18 was obvious in view of Kohr, lack of unity of invention would not necessarily follow for any of the *other* claims, all of which depend from claim 18 and add further distinguishing elements.

Furthermore, it is submitted that an assertion that claim 18 is obvious in view of Kohr is not relevant to a finding of *lack* of a single inventive entity among all of claims 18 through 22 and 24 through 32. Claim 18, taken alone, can only *be* one inventive entity.

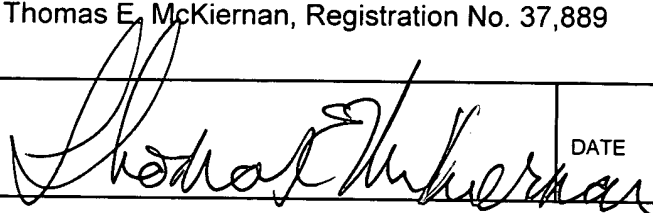
Furthermore, the assertion in the Office Action that "the special technical features linking the two groups does not provide a contribution over the prior art and no single inventive concept exists' is submitted to be a non sequiter, since a special technical feature is *defined* in PCT Rule 13.2 to be a technical feature that defines a contribution which a claimed invention, considered as a whole, makes over the prior art. The fact that the Office Action identifies a special technical feature implies that a contribution is made over the prior art.

Finally, the single inventive concept to which the Office Action refers militates against lack of a single inventive entity. There *must* be a single inventive entity in order for a special technical feature to link the two groups.

The Election/Restriction Requirement is thus submitted to be inappropriate. Withdrawal of the Election/Restriction Requirement is earnestly solicited.

Conclusion:

Allowance of all claims 18 through 22 and 24 through 32 and of this entire application are respectfully requested.

RESPECTFULLY SUBMITTED,					
NAME AND REG. NUMBER	Thomas E. McKiernan, Registration No. 37,889				
SIGNATURE				DATE	07 APR 03
Address	Rothwell, Figg, Ernst & Manbeck 1425 K Street, N.W., Suite 800				
City	Washington	State	D.C.	Zip Code	20005
Country	U.S.A.	Telephone	202-783-6040	Fax	202-783-6031